

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

GREGORY BOYER, as Administrator of  
the Estate of Christine Boyer, and on his  
own behalf,

Plaintiff,

v.

ADVANCED CORRECTIONAL  
HEALTHCARE, INC., LISA PISNEY,  
AMBER FENNIGKOH, MONROE  
COUNTY, WISCONSIN, STAN  
HENDRICKSON, DANIELLE WARREN,  
SHASTA PARKER, AND DOES 1-3,

Defendants.

No. 20-cv-1123-jdp

GREGORY BOYER, as Administrator of  
the Estate of Christine Boyer, and on his  
own behalf,

Plaintiff,

v.

USA MEDICAL & PSYCHOLOGICAL  
STAFFING, NORMAN JOHNSON,  
TRAVIS SCHAMBER, WESLEY  
HARMSTON, AND JILLIAN  
BRESNAHAN,

Defendants.

No. 22-cv-723-jdp

**MONROE COUNTY DEFENDANTS' RESPONSE TO PLAINTIFF'S  
MOTION FOR LEAVE TO FILE FOURTH AMENDED COMPLAINT**

Plaintiff, Gregory Boyer, has moved this Court in Case No. 20-cv-1123-jdp for leave to amend the currently operative Third Amended Complaint and replace it with a Fourth Amended Complaint. (See ECF No. 147, Case No. 20-cv-1123-jdp.) Defendants Monroe County, Stan Hendrickson, Danielle Warren, and Shasta Parker (the "Monroe County defendants") hereby notify the Court that they do not oppose plaintiff's motion to file the

Fourth Amended Complaint, reserving all defenses, affirmative or otherwise, to said amended complaint and their right to answer or otherwise respond to the amended pleading pursuant to Fed. R. Civ. P. 12 and 15.

September 6, 2023

Respectfully submitted,

HANSEN REYNOLDS LLC

/s/ Andrew A. Jones

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Stan Hendrickson, Danielle Warren, and  
Shasta Parker*